

# FRESHFIELDS

**Via ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Silicon Valley**  
855 Main Street  
Redwood City, CA 94063

**Justina Sessions**  
T +1 650 618 9250  
+1 650 461 8276 (Direct)  
F +1 202 507 5945  
E justina.sessions@freshfields.com  
freshfields.us

June 2, 2025

**Re: *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (PKC)**

Dear Judge Castel:

Defendants Google LLC, Alphabet Inc., and YouTube, LLC (together, “Google”) respectfully request that the Court enter the Proposed Order, attached as Exhibit A, extending the deadline for Google to file its response in opposition to Plaintiffs’ pre-motion letter seeking leave to move for an adverse inference. ECF No. 1004. The extension requested will not impact any other deadlines set by the Court. Plaintiffs do not oppose Google’s request. There is no conference currently scheduled before the Court.

On May 30, 2025, Plaintiffs filed a 9 page, single-spaced letter in support of their requested motion, accompanied by thirty exhibits. Given the volume of material at issue, additional time is warranted for Google to review the filing and prepare its response. Google conferred with Plaintiffs by email, who do not oppose this requested extension. Accordingly, Google respectfully requests that the Court enter the Proposed Order attached as Exhibit A, setting a June 11, 2025 deadline for Google to respond to Plaintiffs’ letter.

Respectfully,

/s/ Justina K. Sessions

Justina K. Sessions  
FRESHFIELDS US LLP  
855 Main Street  
Redwood City, CA 94063  
Telephone: (650) 618-9250  
Email: justina.sessions@freshfields.com

June 2, 2025

Page 2

Eric Mahr  
Andrew J. Ewalt  
700 13th Street, NW  
10th Floor  
Washington, DC 20005  
Telephone: (202) 777-4545  
Email: eric.mahr@freshfields.com

Craig M. Reiser  
AXINN, VELTROP & HARKRIDER LLP  
630 Fifth Avenue  
New York, New York 10111  
Telephone: (212) 728-2218  
Email: creiser@axinn.com

Counsel for Defendants Google LLC,  
Alphabet Inc., and YouTube, LLC

CC: All Counsel of Record (via ECF)